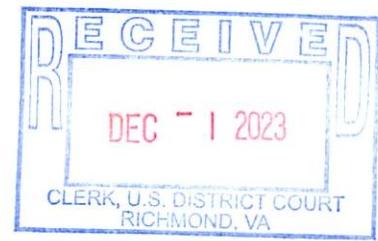




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BY HAND

0900, Wednesday, 29 November 2023, Richmond

UNITED STATES DISTRICT COURT EDVA – Richmond Division
ATTN: Clerk's Office
701 East Broad Street, Suite 3000
Richmond, VA 23219
USA

RE: Case Name: Kathy Steele v. David Steele, et al.
Case Number: 3:21cv573

Dear Sir or Madam:

I am receiver for the law practice of Steven S. Biss, counsel of record for the plaintiff, Kathy Steele. I am responding to a subpoena issued on 30 October 2023.

I. PROCEDURAL POSTURE

Specifically, the Court, by Honorable John A. Gibney, Jr., issued an Order dated 30 October 2023 (Dkt. No. 105) directing the Clerk to serve a subpoena on me dated 30 October 2023 (Dkt. No. 106), requiring my production of the mailing addresses and e-mail addresses for the following parties:

- (1) Kathy Steele; AND
- (2) Earth Intelligence Network.

I received service of the subpoena on 3 November 2023 at 1110, as described in a Process Receipt and Return (Dkt. No. 107).

II. RESPONSE

Kathy Steele

The contact information I have for Kathy Steele is:

Address: 11005 Langton Arms Court
Oakton, VA 22124
E-Mail: katsteele3@gmail.com

I have successfully communicated with Ms. Steele by e-mail.

Earth Intelligence Network

The contact information I have for Earth Intelligence Network is:

Address: 11005 Langton Arms Court
Oakton, VA 22124
E-Mail: katsteele3@gmail.com

III. BACKGROUND AND EXPLANATION

Steven S. Biss suffered a debilitating stroke on 16 August 2023, and the Charlottesville Circuit Court appointed me receiver on 20 September 2023. Sometime between Mr. Biss' stroke and my appointment, someone broke into Mr. Biss' office, searching through his files, leaving files in gross disarray, and possibly removing files and other items.

I was able to access Mr. Biss' office for the first time on Tuesday, 3 October 2023 at 0930. At that time, the office did not have a computer, although it had computer-related items (e.g. connecting cables, printers, and monitors) indicating that a computer had been there. Also, at that time, I was unable to find open or pending files.

I have been investigating the location of the computer and the open, pending files which I believe contain contact information for Ms. Steele and Earth Intelligence Network.

As recently as yesterday, I was able to obtain an e-mail address for Ms. Steele, and I have communicated with her by e-mail and telephone this morning.

Finally, based on extensive, credible, and corroborating evidence from various sources, including attorneys at the Virginia State Bar, Mr. Biss' conservator, Mr. Biss's clients, Mr. Biss' family, and me in my capacity as receiver, I believe I know who possesses Mr. Biss' computer and open, pending files. The Virginia State Bar is currently preparing a motion seeking injunctive relief from the Charlottesville Circuit Court to obtain the computer and files, among other things.

IV. CONCLUSION

My investigation continues, and I have intentionally omitted details of my investigation in this letter to avoid compromising the Virginia State Bar's attempt to seek injunctive relief. However, if the Court has any questions or requires more details, I am willing to cooperate.

Sincerely,

PARK CHAMBERS

By: /s/ *Elliott P. Park*
Elliott P. Park